

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

PENNSYLVANIA STATE CONFERENCE)	
OF THE NAACP, LEAGUE OF WOMEN)	
VOTERS OF PENNSYLVANIA,)	
PHILADELPHIANS ORGANIZED TO)	
WITNESS, EMPOWER AND REBUILD,)	Civ. No. 1:22-cv-339
COMMON CAUSE PENNSYLVANIA,)	
BLACK POLITICAL EMPOWERMENT)	
PROJECT, and MAKE THE ROAD)	
PENNSYLVANIA)	
)	
Plaintiffs,)	
)	
v.)	
)	
LEIGH M. CHAPMAN, in her official)	
capacity as Acting Secretary of the)	
Commonwealth, et al.,)	
)	
Defendants.)	

DECLARATION OF MEGAN C. KEENAN
IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

Pursuant to 28 U.S.C. § 1746, I, Megan C. Keenan, make the following declaration in support of the motion for my admission to appear and practice in this Court in the above-captioned matter as counsel pro hac vice for Plaintiffs Pennsylvania State Conference of the NAACP, League of Women Voters of Pennsylvania, Philadelphians Organized to Witness, Empower and Rebuild, Common Cause Pennsylvania, Black Political Empowerment Project, and Make the Road Pennsylvania in the above-captioned matter pursuant to LCvR 83.2 and LCvR 83.3, LCrR 83.2 and this Court’s Standing Order Regarding Pro Hac Vice Admissions dated May 31, 2006 (Misc. No. 06-151):

1. I am a staff attorney with the American Civil Liberties Union Foundation.
2. My business address is 125 Broad Street, 18th Floor, New York, NY 10004.

3. I am a member in good standing of the bars of the: State of New York, District of Columbia, United States Supreme Court, U.S. Court of Appeals for the Fourth Circuit, U.S. Court of Appeals for the Fifth Circuit, U.S. Court of Appeals for the Sixth Circuit, U.S. District Court for the Southern District of Ohio, and U.S. District Court for the District of Columbia.

4. My bar identification numbers are 5725254 (NY) and 1672508 (DC).

5. A current certificate of good standing from the DC Bar is attached to this Affidavit as Exhibit A.

6. I attest that I am a registered user of ECF in the United States District Court for the Western District of Pennsylvania.

7. I attest that I have read, know and understand the Local Rules of Court for the United States District Court for the Western District of Pennsylvania.

8. Based upon the foregoing, I respectfully request that I be granted pro hac vice admission in this matter.

I certify and attest that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are false, I am subject to punishment.

Respectfully submitted,

Dated: November 8, 2022

s/ Megan C. Keenan
Megan C. Keenan

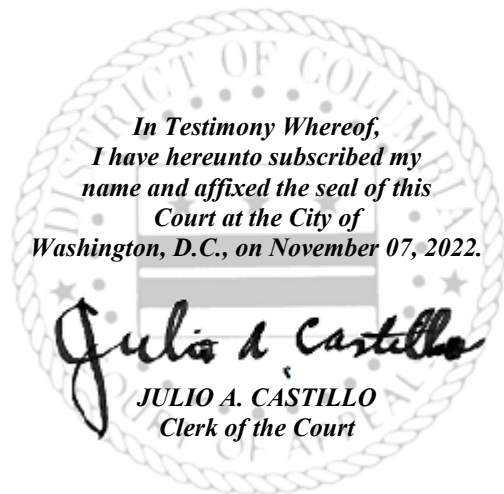
EXHIBIT A



*On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,
the District of Columbia Bar does hereby certify that*

Megan Keenan

*was duly qualified and admitted on May 1, 2020 as an attorney and counselor entitled to
practice before this Court; and is, on the date indicated below, an Active member in good
standing of this Bar.*



Issued By:

A handwritten signature in black ink, which appears to read "David Chu".

*David Chu - Director, Membership
District of Columbia Bar Membership*

***For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email
memberservices@dcbar.org.***